

Message

---

**From:** Libelo, Laurence [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DA33642E6438407DAF4C35AFE870046B-LIBELO, LAURENCE]  
**Sent:** 7/12/2017 4:32:17 PM  
**To:** Shell, Karrie-Jo [Shell.Karrie-Jo@epa.gov]  
**Subject:** RE: HQ PFOA contact

Karrie-Jo,

The MOU program generated many documents. They are in the docket

<https://www.regulations.gov/docket?D=EPA-HQ-OPPT-2004-0112>

The MOU agreement is at

<https://www.regulations.gov/document?D=EPA-HQ-OPPT-2004-0112-0002>

I would suggest that you look at the MOU and at the final reports. We had a lot of comments on them. Also look at the Peer Consultation Panel documents.

Give me a call after 2 if you want to talk.

Laurence

=====

E. Laurence Libelo, Ph.D.  
Senior Environmental Engineer  
Risk Assessment Division  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
OCSPP/OPPT/RAD/AB2  
202-564-8553

---

**From:** Shell, Karrie-Jo  
**Sent:** Wednesday, July 12, 2017 7:31 AM  
**To:** Libelo, Laurence <Libelo.Laurence@epa.gov>  
**Subject:** FW: HQ PFOA contact

Can you send me the 3M MOA? I have searched for it on line, but can't find it. It may be of some use to NC's NPDES program. What do you think?

Karrie-Jo Robinson-Shell, P.E.  
Environmental Engineer  
US EPA Region 4  
Water Protection Division  
61 Forsyth Street  
Atlanta, GA 30303

(404) 562-9308

---

**From:** Shell, Karrie-Jo  
**Sent:** Wednesday, July 12, 2017 6:59 AM  
**To:** Libelo, Laurence <[Libelo.Laurence@epa.gov](mailto:Libelo.Laurence@epa.gov)>  
**Cc:** Davis, Molly <[Davis.Molly@epa.gov](mailto:Davis.Molly@epa.gov)>; Ireland, Sean <[Ireland.Sean@epa.gov](mailto:Ireland.Sean@epa.gov)>; Phillips, Laura <[Phillips.Laura@epa.gov](mailto:Phillips.Laura@epa.gov)>  
**Subject:** RE: HQ PFOA contact

Thanks, Laurence. At this point, NC has been provided the WVA permit and are in the process of drafting the next NPDES permit for Chemours.

I do have a question about the appropriateness of whole effluent toxicity testing. Based on what I have been told, a test for chronic toxicity is best; however, the test should be for exposures longer than the typical timeframe used in NPDES permits, which I think is 7 days.

I am working at home today and will give you a call. What time is best for you?

Karrie-Jo Robinson-Shell, P.E.  
Environmental Engineer  
US EPA Region 4  
Water Protection Division  
61 Forsyth Street  
Atlanta, GA 30303  
(404) 562-9308

---

**From:** Libelo, Laurence  
**Sent:** Monday, July 10, 2017 7:45 AM  
**To:** Shell, Karrie-Jo <[Shell.Karrie-Jo@epa.gov](mailto:Shell.Karrie-Jo@epa.gov)>  
**Cc:** Davis, Molly <[Davis.Molly@epa.gov](mailto:Davis.Molly@epa.gov)>; Ireland, Sean <[Ireland.Sean@epa.gov](mailto:Ireland.Sean@epa.gov)>  
**Subject:** RE: HQ PFOA contact

Hi Karrie-Jo,

I would be happy to talk with you. Please call me at Ex. 6 - Personal Privacy as I am working at home today.

We can talk about the specifics but a few points –

GENX is the chemical DuPont, and now Chemours uses as a PFOS replacement. It is an ether and not just a shorter chain PFAS. West Virginia included it in the DuPont NPDES permit in Parkersburg and they have been measuring it since 2010. This suggests that there is an acceptable analytical method and standards are commercially available.

As we saw with PFOS GENX is likely to have contaminated the environment around the Chemours plant in NC and shutting off the discharge, while a good thing, is not likely to stop inputs into the river. Drinking water monitoring is necessary to ensure that other sources are accounted for.

Also, there are other chemicals that either contain GENX or can degrade to form it. GENX is not new. The structure has been around for decades.

As SEAN mentioned I am pretty familiar with the 3M MOU. I was the technical lead on it and probably know more than anyone about Decatur.

ED\_001723A\_00014705-00002

Give me a call.

Laurence

=====

E. Laurence Libelo, Ph.D.  
Senior Environmental Engineer  
Risk Assessment Division  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
OCSPP/OPPT/RAD/AB2  
202-564-8553

---

**From:** Shell, Karrie-Jo  
**Sent:** Friday, June 30, 2017 11:59 AM  
**To:** Libelo, Laurence <[Libelo.Laurence@epa.gov](mailto:Libelo.Laurence@epa.gov)>  
**Cc:** Davis, Molly <[Davis.Molly@epa.gov](mailto:Davis.Molly@epa.gov)>  
**Subject:** RE: HQ PFOA contact

Hi Laurence,

The Chemour plant in Fayetteville, NC makes a compound called GenX, which we understand is a short carbon-chained (6C) PFOA. The NPDES permit is up for re-issuance, and me and my supervisor (Molly Davis) are trying to provide guidance to the NC permit writer. I anticipate the new permit will include effluent monitoring for the shorter chained PFOAs, fish tissue monitoring near the final outfall (to the Cape Fear River), and possibly a customized chronic whole effluent toxicity test (i.e., a test that would detect/predict possible bioaccumulation of PFOA in fish).

I will be out of the office during the week of the 4<sup>th</sup>, but would like to talk with you when I return to work on July 11<sup>th</sup>. The local Fayetteville newspapers recently reported that the company plan so cease releases of GenX, but I would still like the monitoring in the NPDES permit as verification. Also, since PFOAs bioaccumulate, I would expect that the fish tissue data might be used by NC to post fishing advisories. Lastly, there is a drinking water intake downstream of the plant's final outfall. Our Drinking Water folks are already working with NC on PFOA sampling near the intake.

Thanks, and I look forward to our conversation.

Karrie-Jo Robinson-Shell, P.E.  
Environmental Engineer  
US EPA Region 4  
Water Protection Division  
61 Forsyth Street  
Atlanta, GA 30303  
(404) 562-9308

---

**From:** Ireland, Sean  
**Sent:** Friday, June 30, 2017 11:31 AM  
**To:** Shell, Karrie-Jo <[Shell.Karrie-Jo@epa.gov](mailto:Shell.Karrie-Jo@epa.gov)>  
**Cc:** Libelo, Laurence <[Libelo.Laurence@epa.gov](mailto:Libelo.Laurence@epa.gov)>  
**Subject:** RE: HQ PFOA contact

Laurence is all that, and a bag of chips. A treasure trove of info. Karrie-Jo, meet Laurence. Laurence, meet Karrie-Jo.

FYI - The MOA is for all manufacturers of PFOS and PFOA, not just the 3M plant in Decatur.

Sean Ireland  
Environmental Engineer  
Stormwater Enforcement Workgroup Lead  
NPDES Permitting and Enforcement Branch  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
404-562-9776, office

---

**From:** Shell, Karrie-Jo  
**Sent:** Friday, June 30, 2017 9:47 AM  
**To:** Ireland, Sean <[Ireland.Sean@epa.gov](mailto:Ireland.Sean@epa.gov)>  
**Subject:** HQ PFOA contact

Please provide the last name for Laurence at HQ that is the PFOA expert. I'm still looking for the 3M/EPA MOA regarding the plant in Decatur, AL.

Karrie-Jo Robinson-Shell, P.E.  
Environmental Engineer  
US EPA Region 4  
Water Protection Division  
61 Forsyth Street  
Atlanta, GA 30303  
(404) 562-9308